

From: Bruce Dughi
Sent: Wednesday, November 19, 2014 9:02 AM
To: CEQA Guidelines
Subject: Please finally kill LOS and use VMT in CEQA Guidelines

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Calfee,

I'm writing to comment on the draft guidelines for implementation of SB 743. I am part of a new group called BikeWalkCV, fighting for better biking/walking in Castro Valley. Lets please finally kill rid of LOS!

Alameda County Public Works resisted installing a stop sign at a 3-way intersection at the corner of our high school for many years due to LOS. This is a very busy pedestrian intersection as students arrive and depart school. We finally had an injury where a car hit a pedestrian student while walking in the cross walk. One teacher told me they tried to add that stop sign for 8 yrs. I wrote many emails to Public Works Director, CHP, Sheriff, School Superintendent before Public Works finally installed the stop sign. Public Works resisted this sign because it would reduce the vehicle Level Of Service (LOS) of that intersection. There was no consideration for pedestrian LOS as Public Works clearly prioritized cars over kids. Pedestrians are vulnerable users yet their safety is routinely ignored by Alameda County Public Works.

I are excited about the new guidelines because elimination of automobile congestion as a measure of environmental impact is essential to meeting the original goals of the California Environmental Quality Act. Current CEQA practice has the perverse effect of encouraging faster automobile travel at the expense of bicycle safety. In fact, removal of a mixed travel lane to install a bicycle lane may be considered to have a significant impact on the environment and trigger an extensive review, while the removal of the bike lane to add a mixed travel lane would not.

Increasing bicycling is an official goal of the state of California, as enshrined in the creation of the Active Transportation Program. More bicycling is also an important environmental goal that should be enabled by environmental analysis and regulations. Cities and counties that enable bicycling by creating dedicated and protected space for safe riding have experienced an increase in riding. In turn, more bicycling improves the health of residents.¹ Therefore, I strongly support the draft guidelines with the specific recommendations that follow:

1. I support the use of vehicle miles traveled as a replacement for automobile congestion.
2. I strongly support the inclusion of a requirement to analyze the impacts of a transportation or development project on bicycle safety.
3. Please keep bicycling listed as an appropriate mitigation measure.
4. Apply the guidelines to the whole state as soon as possible.

I strongly support the direction you're going with these new guidelines. If adopted in final form, environmental analysis will improve to support health, safety, and prosperity in our communities.

Sincerely,

Bruce Dughi

[1](#) “Bicycle-friendly city infrastructure in U.S. significantly increases cycling to work by residents, which can improve health of locals” Obesity Society study, November 3, 2014.